P.O. Box 1180, Vancouver, WA 98666 • (360) 693-3611 • Portland (503) 289-8824 • Fax (360) 735-1565 • Portland (503) 285-6091

PORT OF VANCOUVER USA

February 4, 1999

District Engineer
U S Army Corps of Engineer District , Portland
Attn: CENWP-EC-E
PO Box 2946
Portland, OR 97208-2946

RE: Integrated Feasibility Report for Channel Improvement and EIS

Dear Sir:

Thank you for allowing us the opportunity to comment on the draft Integrated Feasibility Report for Channel Improvement and EIS. The CORPS has done an excellent job in conducting this study and documenting the findings, as well as providing the opportunity for public comment.

From a navigation and shipping perspective, the $39.7 million annual transportation efficiency benefit across the system with minimal environmental impact, is a critical factor to the Ports. This cost savings reflects a measurement of enhanced competitiveness for U.S. export products for the region as well as national interests.

It is vital that this project move forward as expeditiously as possible. The Columbia River navigation channel provides a strategic trade corridor to the Pacific Rim, especially for bulk commodities. The Columbia River port system is the nation's largest export gateway for wheat and the second largest grain export port system in the world. These agricultural commodities originate not only in the Pacific Northwest but also include regular shipments from Midwest states such as North Dakota, Colorado, Nebraska, and Iowa. Container cargoes from more than 40 states regularly pass through the Port of Portland.

The draft EIS has identified the economic benefits, offered the most environmentally sound options for construction of the project, proposed mitigation for any impacts, and includes approximately $8 million in added ecosystem restoration projects. The Sponsors Preferred Alternative Disposal Plan addresses the concerns of farmers and landowners on the

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PORT OF VANCOUVER USA

costs for environmental costs and putting approximately 60% of the material to beneficial use.

Need for a Deeper Channel

We support the Corps findings contained in the Feasibility Report to deepen the navigation channel to 43 feet because of the regional and national need for the project. The Columbia River is the region's link to world markets. In 1997 more than 32 million metric tons of waterborne cargo valued at $13 billion moved via lower Columbia River ports. The volume of waterborne international trade is significant locally in terms of jobs, important regionally in terms of the contribution of trade to the regional economy, and of national significance as an export gateway for U.S. products being shipped abroad.

Sponsor's Disposal and Mitigation Plan

To implement the government's least cost plan contained in the draft EIS, the Corps considered more than 157 upland disposal sites along the 114 mile navigation channel. Environmental and engineering screening criteria, coordination with the National Marine Fisheries Service and other resource agencies, and input from public meetings have reduced the list to 31 proposed upland disposal sites, of which eight have not previously been used.

The federal planning process allows local port sponsors the option to propose a "sponsors' plan" as an alternative to the federal "least cost plan" provided that the incremental cost increase of the sponsors' plan is paid for by the sponsors. Consequently the port sponsors developed an alternative plan with the objective of avoiding and minimizing impacts. This sponsors' alternative substitutes transportation costs for environmental costs by moving sand longer distances to appropriate sites where dredged sand can be put to beneficial use, such as industrially zoned sites, remedial activities, or for aggregate use and reclamation. The proposed sponsors' plan contained in the draft EIS relies on 29 upland disposal sites, of which only three are new. At an incremental cost of approximately $5 million over the government's least cost plan, the

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sponsors' plan minimizes the use of farmland and puts much of the sand to beneficial uses. As a result, the sponsors' plan will have less impact on wetlands and about half the wildlife impact as the corresponding mitigation requirement of the government's least cost plan. As an aside, a statement should be included in the Executive Summary referencing the appendices regarding the sponsor's preferred plan

The use of dredged sand to fill future development areas at the Port of Vancouver is a most critical aspect of the project, and allows the port to move forward in developing new industrial areas which provide new jobs and economic benefits to the region. We recommend that the Corps adopt the sponsors' plan in the final EIS because of its orientation to beneficial uses of Dredge material and the reduced impact on the environment.

In conclusion we strongly urge moving ahead with the Columbia River segment of the project quickly. Prompt action here is a key to enhancing the competitiveness of U.S. products. Phasing the improvement work in the Willamette River segment would allow for careful examination of strategies to address the management of dredged materials in that portion of the project.

Sincerely,

Lawrance L. Paulson
Executive Director

LLP:ld

ESTABLISHED 1858

JONES STEVEDORING COMPANY

SERVING AMERICA'S WEST COAST

P.O. BOX 10167 • PORTLAND, OREGON 97296-0167 • 2323 N.W. SUFFOLK STREET, 97210

February 1, 1999

Mr. Steve Stevens
U.S. Army Corps of Engineers
Portland District
P.O. Box 2946
Portland, OR 97208-2946

RE: Lower Columbia River Channel Deepening Project
Comments on Draft Environmental Impact Statement

Dear Mr. Stevens:

On behalf of Jones Stevedoring Company, I am writing to express support for deepening the lower Columbia River deep draft channel from 40 to 43 feet. This channel improvement project is important to the region and the nation. The channel serves as an important competitive corridor for ocean transportation access to key markets in Asia. It requires the depth that the new large bulk, breakbulk and container vessels need in order to provide for these changing needs in the import/export shipping business.

Jones Stevedoring Company is the oldest established stevedoring company, doing business in the Columbia River District since 1908. We load and unload all commodities in this area. It is in the interest of our customers, owners, and employees to have a deep channel serving this area to permit us to compete with other ports and provide competitive services to the users of the channel from Oregon, Washington, most other states, and trading partner nations.

National importance of the channel is evident in a number of ways. The Columbia River port system is the nation's largest export gateway for wheat and the second largest grain export port in the world. These agricultural commodities originate int he Pacific Northwest, but also include regular shipments from Midwest states such as North Dakota, Colorado, Nebraska, and Iowa. Container cargoes from more than 40 states regularly pass through the Port of Portland. As the Corps study notes, annual transportation savings for these shippers amount to an estimate $39 million, a measurement of enhanced competitiveness for U.S. export products.

We offer these specific views of the Draft Environmental Impact Statement (DEIS):

1. Deepening the channel to 43 feet is the best alternative of the options reviewed by the Corps. Other options, such as enhancing the existing Loadmax river level monitoring system will not expand the transportation capacity as needed to support shippers.

TELEPHONE (503) 228-6601 • FAX: (503) 228-0273

2. The disposal plan alternative suggested by the project sponsors offers the best approach to this navigation improvement project. Important agriculture lands would be preserved and dredging disposal impacts would be minimized under the Sponsors' Preferred Alternative Disposal Plan.

3. Environmental considerations are central to a project of this nature and we believe this project will be completed in conformance with this region's environmental standards. Beneficial use of dredged materials, extensive habitat improvements and selection of the Sponsors' Preferred Alternative Disposal Plan to minimize disposal impacts are key steps in proceeding in a sensitive manner.

4. We strongly recommend moving ahead with the Columbia River segment of the project quickly. Prompt action here is a key to enhancing the competitiveness of U.S. products. Phasing the improvement work in the Willamette River segment would allow for careful examination of strategies to address the management of dredged materials in that portion of the project.

Thank you for the opportunity to share our views on the Columbia River channel improvement project. Efforts by the Corps of Engineers to expedite completion of this important navigation improvement will be greatly appreciated.

Very truly yours,

JONES STEVEDORING COMPANY

B. Turrell

Captain Brian Turrell, Director

CBT/pag
cc: Ms. C. Dianne Perry, Executive Director
Columbia River Channel Coalition
6208 N. Ensign Street
Portland, OR 97217

BBL
BERNERT BARGE LINES

421 HIGH STREET, SUITE 108
OREGON CITY, OR 97045
PHONE: (503) 656-8288 FAX: (503) 657-3922

29 January 1999

Steve Stevens
U.S. Army Corps of Engineers
Portland District
P.O. Box 2946
Portland, Oregon 97208-2926

RE: LOWER COLUMBIA RIVER CHANNEL DEEPENING PROJECT-
COMMENTS ON DRAFT ENVIRONMENTAL IMPACT STATEMENT

On behalf of Bernert Barge Lines, I am expressing support for deepening the lower Columbia River deep draft channel from 40 to 43 feet. The channel deepening project is vital to the Northwest and the entire nation. The channel is an integral part of a major competitive corridor for ocean transportation access to key markets in Asia, South America, and Australia.

The Columbia River port system is the nation's largest export gateway for wheat and the largest grain export port in the world. 15 container lines call Portland and provide shipping services literally anywhere in the world. As the Corps study notes, annual transportation savings for these shippers amount to an estimated $39 million, increasing competitiveness for U.S. export and import products.

I offer these specific opinions of the Draft Environmental Impact Statement (DEIS)

1 Deepening the channel to 43 feet is the best alternative of the options reviewed by the Corps. Other options, such as enhancing the existing Loadmax river level monitoring system will not expand the transportation capacity as needed to support shippers
2. The disposal plan alternative suggested by the project sponsors offers the best approach to this navigation improvement project. Important agriculture lands would be preserved and dredging disposal impacts would be minimized under the Sponsors' Preferred Alternative Disposal Plan.
3 Environmental considerations are central to this type of project and I believe this project can be completed in conformance with the region's environmental standards. Alternative use of dredged materials, continued habitat improvements, and selection of the Sponsors' Preferred Alternative Disposal Plan to minimize disposal impacts are key steps in proceeding in a sensitive and efficient manner.
4 I strongly recommend moving ahead with the Columbia River segment of the project rapidly. Prompt action is crucial to enhancing the competitiveness of U.S. products in the changing international marketplace. Phasing the improvement work in the

Willamette River segment would allow for careful examination of options to address the management of dredged materials in that portion of the project

Thank you for the opportunity to comment on the Columbia River channel improvement project. Efforts by the Corps of Engineers to expedite completion of this critical navigation improvement will be greatly appreciated.

Sincerely,

Mike Henry

Mike Henry
Traffic Mgr.

GREATER VANCOUVER CHAMBER OF COMMERCE

SINCE 1890

(360) 694-2588
Fax (360) 693-8279
http://www.vancouverusa.com
email: chamber@pacifier.com

404 East
Fifteenth
Street
Suite 11
Vancouver
Washington
98663

Community Choices 2010

Identify Clark County

Leadership Clark County

January 28, 1999

Steve Stevens
U.S. Army Corps of Engineers
Portland District
P.O. Box 2946
Portland, Oregon 97208-2946

RE: LOWER COLUMBIA RIVER CHANNEL DEEPENING PROJECT--COMMENTS ON DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Stevens:

On behalf of the Greater Vancouver Chamber of Commerce, I am writing to express support for deepening the lower Columbia River deep draft channel from 40 to 43 feet. This channel improvement project is important to the region and the nation. The channel serves as an important competitive corridor for ocean transportation access to key markets in Asia.

Here at home, the Port of Vancouver USA generates an estimated $180 million in local business revenue each year. It annually handles more than 440 ocean-going vessels and river barges with total tonnage exceeding five million tons. The Port is one of the largest grain exporters in the United States with industrial tenants employing 3,000 people with a payroll of $72 million a year.

National importance of the channel is evident in a number of ways. The Columbia River port system is the nation's largest export gateway for wheat and the second largest grain export port in the world. These agricultural commodities originate in the Pacific Northwest, but also include regular shipments from Midwest states such as North Dakota, Colorado, Nebraska, and Iowa. As the Corps study notes, annual transportation savings for these shippers amount to an estimated $39 million, a measurement of enhanced competitiveness for U.S. export products.

Specifically, we have the following comments regarding the Draft Environmental Impact Statement:

1. Deepening the channel to 43 feet is the best alternative of the options reviewed by the Corps. Other options, such as enhancing the existing Loadmax river level monitoring system will not expand the transportation capacity as needed to support shippers

2. The disposal plan alternative suggested by the project sponsors offers the best approach to this navigation improvement project. Important agriculture lands would be preserved and dredging disposal impacts would be minimized under the Sponsors' Preferred Alternative Disposal Plan.

3. Environmental considerations are central to a project of this nature and we believe this project can be completed in conformance with this region's environmental standards. Beneficial use of dredged materials, extensive habitat improvements and selection of the Sponsors' Preferred Alternative Disposal Plan to minimize disposal impacts are key steps in proceeding in a sensitive manner.

4. We strongly recommend moving ahead with the Columbia River segment of the project quickly. Prompt action here is a key to enhancing the competitiveness of U.S. products. Phasing the improvement work in the Willamette River segment would allow for careful examination of strategies to address the management of dredged materials in that portion of the project.

Thank you for the opportunity to share our views on the Columbia River channel improvement project. Efforts by the Corps of Engineers to expedite completion of this important navigation improvement will be greatly appreciated.

Sincerely,

Charles W. "Bill" Fromhold
PRESIDENT / CEO

cc: U.S. Representative Brian Baird
U.S. Senator Slade Gorton
U.S. Senator Patty Murray
Larry Paulson, Executive Director, Port of Vancouver USA
John White, Chair, GVCC Board of Directors
Joe Pinzone, Chair-Elect, GVCC Board of Directors
Catherine Rich-Daniels, Chair, GVCC Transportation Business Interest Group

Oregon POTATOES

Oregon Potato Commission

February 2, 1999

Mr. Steve Stevens
U.S. Army Corps of Engineers - Portland District
P.O. Box 2946
Portland, Oregon 97208-2946

Re: Lower Columbia River Channel Deepening Project – Comments on Draft Environmental Impact Statement

On behalf of the Oregon Potato Commission, I am writing to express support for deepening the lower Columbia River deep draft channel from 40 to 43 feet. This channel improvement project is important to the region and the nation. The channel serves as an important competitive corridor for ocean transportation access to key markets in Asia.

The Oregon Potato Commission represents 400 growers around the state. Approximately 75% of the potatoes produced in Oregon now go for processing into products such as frozen french fries, chips, and dehydrated potato flakes. We have seen tremendous export growth for these products over the past decade, and feel that the channel deepening would lower our export costs and help make us even more competitive in the international marketplace.

National importance of the channel is evident in a number of ways. The Columbia River port system is the nation's largest export gateway for wheat, and the second largest grain export port in the world. These agricultural commodities originate in the Pacific Northwest, and also include regular shipments from Midwest states such as North Dakota, Colorado, Nebraska, and Iowa. Container cargoes from more than 40 states regularly pass through the Port of Portland. As the Corps study notes, annual transportation savings for these shippers amount to an estimated $39 million, a measurement of enhanced competitiveness for U.S. export products.

The Oregon Potato Commission offers these specific views of the Draft Environmental Impact Statement (DEIS):

1. Deepening the channel to 43 feet is the best alternative of the options reviewed by the Corps. Other options, such as enhancing the existing Loadmax river level monitoring system will not expand the transportation capacity as needed to support shippers.
2. The disposal plan alternative suggested by the project sponsors offers the best approach to this navigation improvement project. Important agriculture lands would be preserved and dredging disposal impacts would be minimized under the Sponsors' Preferred Alternative Disposal Plan.
3. Environmental considerations are central to a project of this nature, and we believe this project can be completed in conformance with this region's environmental standards. Beneficial use of dredged materials, extensive habitat improvement, and selection of the Sponsors' Preferred Alternative Disposal Plan to minimize disposal impacts are key steps in proceeding in a sensitive manner.
4. We strongly recommend moving ahead with the Columbia River segment of the project quickly. Prompt action here is a key to enhancing the competitiveness of U.S. products. Phasing the improvement work in the Willamette River segment would allow for careful examination of strategies to address the management of dredged materials in that portion of the project.

Thank you for the opportunity to share our views on the Columbia River channel improvement project. Efforts by the Corps of Engineers to expedite completion of this important navigation improvement will be greatly appreciated.

Sincerely,

William N. Wise
Administration & CEO

Thank-you for your attentions & these comments

700 N.E. Multnomah, Suite 460 • Portland, Oregon 97232-4104
(503) 731-3300 • FAX (503) 239-4763

UNITED GRAIN CORPORATION

200 S.W. Market Street
Suite 1700
Portland, OR 97201-6281
(503) 228-6424

February 3, 1999

Steve Stevens
U.S. Army Corps of Engineers
Portland District
PO Box 2946
Portland, Oregon 97208-2946

RE: LOWER COLMBIA RIVER CHANNNEL DEEPENING PROJECT—
COMMENTS ON DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Stevens,

On behalf of United Grain Corporation, I am writing to express support for the deepening of the lower Columbia River deep draft channel from 40 to 43 feet. This channel improvement project is important to the region and the nation. The channel serves as an important corridor for ocean transportation carrying U.S. goods and commodities to key markets in Asia and elsewhere, and we may be placed at a competitive disadvantage if this step is not taken to improve vessel access to the port.

United Grain has been in the export business for nearly 30 years, exporting wheat and other grains to customers in Asia and beyond from our facility in Vancouver, Washington. As you may know, the Columbia River port system is the largest export gateway for wheat and the second largest grain export port in the world. These agricultural commodities originate mostly in the Pacific Northwest, but we also regularly purchase shipments from Midwest states such as North Dakota, Colorado, Nebraska and Iowa.

The grain business is highly competitive and operates in an integrated international market, and we regularly find ourselves in direct competition with suppliers from Canada, Australia, Argentina and Europe. In recent years, we have seen our export volumes decline, as overseas buyers have replaced their Northwest purchases with grain purchased from our competitors. Our current inability to service larger vessels with deeper drafts in effect puts us at a competitive disadvantage as many of our customers are looking to maximize economies of scale and charter larger vessels with deeper drafts.

Deepening the channel will place us back on a more even playing field. The per-unit cost savings that shippers realize will reduce their cost of imports, in effect increasing their purchasing power for Northwest grains, and will allow this region to maximize its other comparative advantages, effectively attracting increased volumes to this port. In a year such as this, with low export volumes already a topic of great concern, and with the government considering aid packages to farmers to address the declines in farm income resulting from low grain prices, anything to enhance the competitiveness of U.S. grain exports will certainly be well received throughout the farm belt.

In addition, container cargoes from more than 40 states regularly pass through the Columbia River system. As the deeper channel will be of benefit to all commercial traffic in the Columbia River district, this region will be prepared for any unforeseen market demand that may emerge in the future. Moreover, a deeper channel will add to the safety of vessel movement, as tidal or river level changes will present less of a danger to navigation.

With regard to your Draft Environmental Impact Statement (DEIS), I would like to offer the following specific views:

1 Deepening the channel to 43 feet is the best alternative of the options reviewed by the Corps. Other options, such as enhancing the existing Loadmax river level monitoring system will not expand the transportation capacity as needed to support shippers.

2. The disposal plan alternative suggested by the project sponsors offers the best approach to this navigation improvement project. Important agriculture lands would be preserved and dredging disposal impacts would be minimized under the Sponsors' Preferred Alternative Disposal Plan.

3. Environmental considerations are, of course, central to a project of this nature and I believe this project can be completed in conformance with this region's environmental standards. Beneficial use of dredged materials, extensive habitat improvements and selection of the Sponsors' Preferred Alternative Disposal Plan to minimize disposal impacts are key steps in proceeding in a sensitive manner.

4 I strongly recommend moving ahead with the Columbia River segment of the project quickly. Prompt action here is a key to enhancing competitiveness of U.S. products. Phasing the improvement work in the Willamette River segment would allow for careful examination of strategies to address the management of dredged materials in that portion of the project.

Thank you for the opportunity to share my views on the Columbia River channel improvement project. Efforts by the Corps of Engineers to expedite completion of this important navigation improvement will be greatly appreciated.

Sincerely yours,

William Cormack
President,
United Grain Corporation

OREGON PUBLIC PORTS ASSOCIATION

February 2, 1999

Mr. Steve Stevens
U.S. Army Corps of Engineers
Portland District
PO Box 2946
Portland, Oregon 97208-2946

SUBJECT: Lower Columbia River Channel Deepening – Comments on Draft Environmental Impact Statement

On behalf of the Oregon Public Ports Association, I am writing to express support for deepening the lower Columbia River deep draft channel from 40 to 43 feet. This channel improvement project is important to the region and the nation because the channel serves as an important competitive corridor for ocean transportation access to key markets in Asia.

National impacts for the channel are evident in a number of ways. The Columbia River port system is the nation's largest export gateway for wheat and the second largest grain export port in the world. These agricultural commodities originate in the Pacific Northwest, but also include regular shipments from Midwest states such as North Dakota, Colorado, Nebraska and Iowa. Container cargoes from more than 40 states regularly pass through the Port of Portland. As the Corps of study notes, annual transportation savings for these shippers amount to an estimated $39 million, a measurement of enhanced competitiveness for U.S. export products.

We offer these specific views of the Draft Environmental Impact Statement (DEIS):

1. Deepening the channel to 43 feet is the best alternative of the options reviewed by the Corps. Other options, such as enhancing the existing Loadmax river level monitoring system will not expand the transportation capacity as needed to support shippers.

2. The alternatives suggested by the project sponsors also offer the best approach to this navigation improvement project. Important agriculture lands would be preserved and dredging disposal impacts would be minimized under the Sponsors' alternative.

3. Environmental considerations are central to a project of this nature and we believe this project can be completed in conformance with this region's environmental standards. Beneficial use of dredge materials, extensive habitat improvements and selection of project options to minimize disposal impacts are key steps in proceeding in a sensitive manner.

565 Union Street NE, Suite 209 • Salem, Oregon 97301 • (503) 585-1250 • FAX (503) 585-8993

4. We strongly recommend moving ahead with the Columbia River segment of the project quickly Prompt action here is a key to enhancing the competitiveness of U.S. products. Phasing the improvement work in the Willamette River segment would allow for careful examination of strategies to address the management of dredged materials in that portion of the project.

Thank you for the opportunity to share our views on the Columbia River channel improvement project. Efforts by the Corps of Engineers to expedite completion of this important navigation improvement will be greatly appreciated.

Sincerely,

OREGON PUBLIC PORTS ASSOCIATION

Kenneth W. Armstrong
Executive Director

KWA:adr

PORT OF WOODLAND
141 Davidson Avenue
P.O. Box 87
Woodland, Washington 98674

(360) 225-6555
FAX 360-225-6556

February 3, 1999

District Engineer
U.S. Army Corps of Engineers District, Portland
Attn: CENWP-EC-E
P.O. Box 2946
Portland, Or 97208-2946

Dear Sir:

This letter provides comments from the Port of Woodland on the Corps of Engineers' Draft Integrated Columbia and Lower Willamette Rivers Channel Improvement Study and Environmental Impact Statement.

The Port of Woodland fully supports the Corps' findings contained in the Channel Improvement Study to deepen the navigation channel to 43 feet. The Columbia River is the region's link to world markets. The volume of waterborne international trade is significant locally in terms of jobs, important regionally in terms of the contribution of trade to the regional economy, and of national significance as an export gateway for U.S. products being shipped abroad. For example, 43% of all U.S. wheat exports and 25% of all U.S. grain exports move through the Columbia River system.

The Port recommends that the Corps adopt the sponsors' plan for disposal of dredged material in the final EIS because of its reduced impact on the environment. The sponsor's plan attempts to avoid or minimize impacts by substituting transportation costs for environmental costs and planning for beneficial uses of dredged material where possible.

The Columbia River navigation system is a major part of the economy in the Pacific Northwest and is vital for supporting jobs in Cowlitz County. Deepening the Columbia River to 43 feet will help sustain our competitiveness and support job growth into the future.

The Port of Woodland urges the Corps to include the sponsors' plan in the final EIS and to expedite authorization and construction of this critical project. .

Sincerely,

David R. Ripp
Port Manager

PNWA
PACIFIC NORTHWEST
WATERWAYS ASSOCIATION

February 1, 1999

Steve Stevens
U.S. Army Corps of Engineers
Portland District
P.O. Box2946
Portland, Oregon 97208-2946

LOWER COLUMBIA RIVER CHANNEL DEEPENING—
COMMENTS ON DRAFT ENVIRONMENTAL IMPACT STATEMENT

On behalf of the Pacific Northwest Waterways Association, I am writing to express support for deepening the lower Columbia River deep draft channel from 40 to 43 feet We also support the sponsors' preferred plan. This channel improvement project is important to the region and the nation because the channel serves as an important competitive corridor for ocean transportation access to key markets in Asia.

Established in 1934, the Pacific Northwest Waterways represents 120 ports, energy providers, manufacturers, tug, barge, and steamship operators, agricultural and forest products producers, irrigation districts, municipalities and consultants from the States of Idaho, Oregon and Washington, and Washington, DC on issues related to transportation, energy, trade, and resource use.

The Columbia River channel deepening to 43 feet was unanimously endorsed as a PNWA priority issue by our membership at our Annual Meeting held last November. This endorsement means that the project is supported by a wide range of interests from Oregon, Washington and Idaho. It is supported by the steamship operators that carry the cargo to and from international markets, the deep draft ports on the Columbia that handle the cargo, the tug and barge operators and the inland ports that feed the cargo to the lower Columbia, the wheat growers, other agricultural producers and forest products producers who ship the cargo and who, since 1986, have paid for the maintenance of the deep draft channel through the Harbor Maintenance Tax. It is also supported by public and investor-owned utilities in the region who understand the positive impact of the deepening to the long term economic health of the region. Furthermore, the Columbia River channel deepening is supported by ports in Puget Sound, who are concerned about potential negative impacts on congestion and freight mobility in Puget Sound if the project is not completed.

POST OFFICE BOX 61473 • VANCOUVER, WASHINGTON 98666-1473
TELEPHONE: 360-699-4666 • FAX: 360-699-5121 • INTERNET: PNWAMAIL@aol.com

National impacts for the channel are evident in a number of ways. The Columbia River port system is the nation's largest export gateway for wheat and the second largest grain export port in the world. These agricultural commodities originate in the Pacific Northwest, but also include regular shipments from Midwest states such as North Dakota, Colorado, Nebraska, Iowa. Container cargoes from more than 40 states regularly pass through the Port of Portland As the Corps study notes, annual transportation savings for these shippers amount to an estimated $39 million, a measurement of enhanced competitiveness for U.S. export products.

We offer these specific comments on the Draft Environmental Impact Statement (DEIS):

1. Deepening the channel to 43 feet is the best alternative of the options reviewed by the Corps. Other options, such as enhancing the existing Loadmax river level monitoring system will not expand the transportation capacity as needed to support shippers.

2. The alternatives suggested by the project sponsors also offer the best approach to this navigation improvement project. Important agriculture lands would be preserved and dredging disposal impacts would be minimized under the Sponsors' alternative.

3. Environmental considerations are central to a project of this mature and we believe this project can be completed in conformance with this region's environmental standards. Beneficial use of dredge materials, extensive habitat improvements and selection of project options to minimize disposal impacts are key steps in proceeding in a sensitive manner.

4. We strongly recommend moving ahead with the Columbia River segment of the project quickly. Prompt action here is a key to enhancing the competitiveness of the U.S. products. Phasing the improvement work in the Willamette River segment would allow for careful examination of strategies to address the management of dredged materials in that portion of the project.

Thank you for the opportunity to comment on the Columbia River channel improvement project. Efforts by the Corps of Engineers to expedite completion of this important navigation improvement will be greatly appreciated by a wide range of interests throughout the region.

Sincerely,

Glenn Vanselow, Ph.D.
Executive Director

SCHNITZER STEEL INDUSTRIES, INC.
3200 NW Yeon Avenue P.O. Box 10047 Portland, Oregon 97296-0047
Phone (503) 224-9900 Telex 289875 FAX (503) 299-2277

February 1, 1999

Mr. Steve Stevens
U.S. Army Corps of Engineers
Portland District
P.O. Box 2946
Portland, Oregon 97208-2946

RE: LOWER COLUMBIA RIVER CHANNEL DEEPENING--COMMENTS ON DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Stevens:

This is to provide comments on the draft environmental impact statement and to express support for the Columbia River navigation channel from minus 40 to minus 43 feet. We strongly believe the proposed channel deepening improvement is critical to the region and to the nation, serving as a key competitive trade/transportation corridor for U.S. shippers to world markets.

Schnitzer Steel Industries, Inc., with corporate headquarters in Portland, Oregon, is a scrap metal recycling and steel manufacturing business, with eleven scrap collection and processing yards in Oregon, Washington, California and Alaska (with deep draft marine terminals in Tacoma, WA; Portland, OR; and, Oakland, CA) and an electric arc furnace steel manufacturing "mini-mill" in McMinnville, Oregon. Through joint venture operations, Schnitzer is also involved in twenty-nine additional scrap metal recycling collection and processing yards in southern California, the southwest U.S. and most New England states (including deep draft marine terminals in Los Angeles, CA; Portland, ME; Providence, RI; Everett, MA; and, Jersey City, NJ).

From these many different locations, we well understand and value the important role the transportation system has not only on our business, but the economic vitality of entire regions of the country. Moving ahead with the Columbia River channel deepening project is vital to assuring continued freight mobility and competitiveness of U.S. shippers and manufacturers.

Certainly an important matter to appropriately study and evaluate are the environmental impacts the channel deepening project might have locally. We believe there have been fairly broad reviews of reasonable and feasible alternatives to dredging that might address other ways to meet our regional and national transportation needs. From our perspective, the alternatives suggested by the project sponsors appear to be quite sensitive to

environmental issues, provide sensitivity to preservation of lands for agriculture, and minimize potential adverse impacts associated with dredging and dredge spoils disposal while encouraging beneficial uses. Although perhaps difficult to quantify, the report should also be sensitive to the additional environmental benefits the channel deepening project might have by better serving the U.S. transportation needs of shippers and manufacturers, who might otherwise be forced to ship less competitively through other ports -- which could actually encourage increased environmental degradation through greater reliance on existing transportation alternatives that might generate added pollution elsewhere.

Please move this project forward quickly. The need for the deeper channel is already here....and we believe multiple beneficial uses of the dredged materials could also foster speedier habitat improvements and restoration/recovery efforts.

Very truly yours,

SCHNITZER STEEL INDUSTRIES, INC

Tom Zelenka
Manager
Legislative/Environmental
and Public Affairs

TZ:llc
G:\TZ\coldredge

W.G.
MOE
& Sons

February 2, 1999

Steve Stevens
U.S. Army Corps of Engineers
Portland District
P.O. Box 2946
Portland, Oregon 97208-2946

RE: LOWER COLUMBIA RIVER CHANNEL DEEPENING PROJECT

On behalf of W. G. Moe & Sons, Inc, and representing my position with the Oregon Columbia Chapter of AGC I am writing to express support for deepening the lower Columbia River deep draft channel from 40 to 43 feet. This channel improvement project is important to the region and the nation. The channel serves as an important competitive corridor for ocean transportation access to key markets in Asia.

I am aware of the financial and economic boom this will bring to our states and I think it is really a necessary step.

National importance of the channel is evident in a number of ways. The Columbia River port system is the nation's largest export gateway for wheat and the second largest grain export port in the world. These agricultural commodities originate in the Pacific Northwest, but also include regular shipments from Midwest states such as North Dakota, Colorado, Nebraska, and Iowa. Container cargoes from more than 40 states regularly pass through the Port of Portland. As the Corps study notes, annual transportation savings for these shippers amount to an estimated $39 million, a measurement of enhanced competitiveness for U.S. export products.

AGC and I offer these specific views *of* the *Draft* Environmental Impact Statement (DEIS):

1. Deepening the channel to 43 feet is the best alternative of the options reviewed by the Corps. Other options, such as enhancing the existing Loadmax river level monitoring system will not expand the transportation capacity as needed to support shippers.

2. The disposal plan alternative suggested by the project sponsors offers the best approach to this navigation improvement project. Important agriculture lands would be preserved and dredging disposal impacts would be minimized under the Sponsors' Preferred Alternative Disposal Plan.

3. Environmental considerations are central to a project of this nature and we believe this project can be completed in conformance with this region's environmental standards. Beneficial use of dredged materials, extensive habitat improvements and selection of the Sponsors' Preferred Alternative Disposal Plan to minimize disposal impacts are key steps in proceeding in a sensitive manner.

4. I strongly recommend moving ahead with the Columbia River segment of the project quickly. Prompt action here is a key to enhancing the competitiveness of U.S. products. Phasing the improvement work in the Willamette River segment would allow for careful examination of strategies to address the management of dredged materials in that portion of the project.

Thank you for the opportunity to share my views on the Columbia River channel improvement project. Efforts by the Corps of Engineers to expedite completion of this important navigation improvement will be greatly appreciated.

Sincerely,

William H. Moe
W. G. Moe & Sons, Inc.
AGC Oregon Columbia Chapter Representative

WHM/ls

CC: Craig Honeyman AGC Executive Director
C. Dianne Perry Executive Director CRCC

8850 S.E. 76TH DR. • PORTLAND, OR 97206-9767 TELEPHONE 503-775-8651 • FAX 503-775-1069

Building and Construction Trades Council

IN AFFILIATION WITH
BUILDING AND CONSTRUCTION TRADES DEPARTMENT
AMERICAN FEDERATION OF LABOR AND CONGRESS OF INDUSTRIAL ORGANIZATIONS
P.O. BOX 2393
LONGVIEW, WASHINGTON 98632

February 1, 1999

Steve Stevens
U.S. Army Corp of Engineers
Portland District
P.O. Box 2946
Portland, OR 97208-2946

RE: Lower Columbia River Channel Deepening Project-Comments on Draft Environmental Impact Statement

On behalf of the Longview-Kelso Building Trades Council, we are writing to express support for deepening the lower Columbia River deep draft channel from 40 to 43 feet. This channel improvement project is important to the region and the nation. The channel serves as an important competitive corridor for ocean transportation access to key markets in Asia.

The channel deepening is key to the economic development for all of the employers and workers along the river. The new generation cargo ships are entering and exiting the ports with partial loads, as they require the deeper draft channel. We feel that the only way to make the Columbia River Ports competitive in the Pacific Rim is to deepen the Columbia River.

National importance of the channel is evident in a number of ways. The Columbia River Port system is the nation's largest export gateway for wheat, and the second largest grain export port in the world. These agricultural commodities originate in the Pacific Northwest, but also include regular shipments from Midwest states such as North Dakota, Colorado, Nebraska, and Iowa. Container cargoes from more that 40 states regularly pass through the Port of Portland. As the Corps study notes, annual transportation savings for these shippers amount to an estimated $39 million. a measurement of enhanced competitiveness for U.S. export products.

We offer these specific views of the Draft Environmental Impact Statement (DEIS):

1 Deepening the channel to 43 feet is the best alternative to the options reviewed by the Corps. Other options, such as enhancing the existing Loadmax river level monitoring system will not expand the transportation capacity as needed to support shippers.

2 The disposal plan alternative suggested by the project sponsor offers the best approach to the navigation improvement project. Important agricultural lands would be preserved and dredging disposal impacts would be minimized under the Sponsors' Preferred Alternative Disposal Plan.

3 Environmental considerations are central to a project of this nature and we believe this project can be completed in conformance with this region's environmental standards. Beneficial use of dredged materials, extensive habitat improvements and selection of the Sponsors' Preferred Alternative Disposal Plan to minimize disposal impacts are key steps in proceeding in a sensitive manner.

4 We strongly recommend moving ahead with the Columbia River segment of the project quickly. Prompt action here is a key to enhancing the competitiveness of U.S. products. Phasing the improvement work in the Willamette River segment would allow for careful examination of strategies to address the management of dredged materials in that portion of the project.

Thank you for the opportunity to share our views on the Columbia River channel improvement project. Efforts by the Corps of Engineers to expedite completion of this important navigation improvement will be greatly appreciated.

Sincerely,

Tom Harris

Tom Harris
President

Peterson&Associates, P.S.
CERTIFIED PUBLIC ACCOUNTANTS

February 1, 1999

Mr. Steve Stevens
U. S. Army Corps of Engineers
Portland District
P. O. Box 2946
Portland, OR 97208-2946

Dear Mr. Stevens:

Re: Lower Columbia River Channel Deepening Project--
Comments on Draft Environmental Impact Statement

I am writing to support deepening the lower Columbia River deep draft channel from forty to forty-three feet. The channel serves as an important corridor for transportation access of northwest products to world markets.

The environmental impact will be minimal and in some ways beneficial.

1. Deepening the channel is a better alternative for transportation than building highways or railroads. The deepened channel leaves no visible impact. Some consider roads and highways to be a scar on the landscape.

2. The material, generally sand, that will be removed from the river is a very useful product. It is useful as a building material for dikes, concrete ingredient, fill material, etc. It is also very useful as a mixture in topsoil. Where can material for these purposes be acquired with less damage to the environment?

3 I strongly recommend prompt action on the Columbia River segment of the project.

Thank you for the opportunity to share my views on the Columbia River channel improvement project.

Sincerely,

Vernon F. Peterson

VFP:psm
e:\w\v\ss

7917 NE Hazel Dell Avenue ■ P.O. Box 65009 ■ Vancouver, WA 98665 ■ FAX (360) 573-4499 ■ (360) 574-0644

INTERSTATE COLUMBIA RIVER IMPROVEMENT PROJECT
P.O Box 3529 Portland, Oregon 97208

Port of Kalama Port of Longview Port of Portland
Port of St. Helens Port of Vancouver
Port of Woodland

February 4, 1999

District Engineer
U.S. Army Corps of Engineers District, Portland
Attn: CENWP-EC-E
P.O. Box 2946
Portland, Oregon 97208-2946

Dear Sir:

This letter provides consolidated comments from the lower Columbia River ports (non federal sponsors) on the U.S. Army Corps of Engineers "Draft Integrated Feasibility Report for Channel Improvements and Environmental Impact Statement for the Columbia & Lower Willamette River Navigation Channel."

We wish to commend the Corps of Engineers on the clarity of the draft Feasibility Report / EIS (DEIS). One seldom finds a government document of this magnitude that is as well organized and easy to read. The DEIS is clear, concise and is written in language that can be easily understood by the public. The Corps is also to be commended for completing the draft on schedule. The regional and national importance of this project fully justified the additional effort required by the Corps to work through competing priorities in order to get the report out on time.

As sponsoring ports, we are committed to finding the most cost effective and environmentally sound method of deepening the Columbia / Willamette River navigation channel and preserving the region's position as a gateway for international trade. This commitment was formally stated in a resolution signed by John Fratt, former Chairman of the Interstate Columbia River Improvement Project, former Senator Mark Hatfield of Oregon and Senator Slade Gorton of Washington on September 6, 1994. This commitment continues today.

Need for a Deeper Channel

We support Corps findings contained in the Feasibility Report to deepen the navigation channel to 43 feet because of the regional and national need for the project. The Columbia River is the region's link to world markets. In 1997 more

than 32 million metric tons of waterborne cargo valued at $13 billion moved via lower Columbia River ports. The volume of waterborne international trade is significant locally in terms of jobs, important regionally in terms of the contribution of trade to the regional economy, and of national significance as an export gateway for U.S. products being shipped abroad. Portland, for instance is the largest wheat port in the U.S. The sponsoring lower Columbia River ports comprise the second largest grain exporting system in the world.

The lower Columbia River navigation channel has been actively dredged for more than 100 years. The existing 40 foot channel, which was authorized by Congress in 1962, has become inadequate to handle fully loaded dry bulk ships as well as calls from the larger container vessels. Because of the region's position as a national export gateway, the channel depth limitation increasingly threatens the nation's ability to provide competitively priced transportation compared with the international competition. The lower Columbia River ports have been actively engaged in the channel deepening project for over ten years. With each passing month the competitive disadvantage to the region and the nation increases. The channel needs to be deepened now. The DEIS in its conservative analysis offers a $39,700,000 annual transportation efficiency benefit across the system with minimal environmental impact. This cost savings is a measure of the enhanced competitiveness for U.S export products from a deeper channel.

Commodity Forecasts

Suggestions that the long-term commodity forecasts contained in the Feasibility Study be revised downward to reflect the recent economic difficulties now being experienced by Asian countries are misguided. We believe that any revisions based on this premise would be unjustified.

While long-term economic forecasts are typically presented as sequential trends with growth or decline occurring in steady increments, actual economic behavior is far more erratic. This is particularly true in international trade where periods of explosive growth are often followed by short-term retractions. It is because short-term trends can be erratic and misleading that economic forecasts relating to long-life infrastructure projects are based on long-term perspectives. Care must be given to avoid giving undue weight to current economic conditions when making such forecasts.

We believe that the current economic difficulties in Asia, while having a discernible impact on recent trade volumes, will not be long-lasting. This viewpoint is shared by virtually every economic forecasting group. Indeed, there are strong indications that the worst of the crisis has already passed and that the decline in export trade has ceased and perhaps trade has even started to grow again. This trend is reflected in the performance of the lower Columbia River container and grain businesses in the latter part of 1998.

For example, the commodity forecast for corn severely understates probable future corn exports from the Columbia River. Table 11, page 26, Appendix C, of the Report shows projected corn tonnage at 4.7 million tons in 2004, increasing to 5.4 million tons in 2014 and 6.4 million tons in 2024. To understand how extremely conservative this forecast is, one need only observe that historical Columbia River corn volumes have exceeded the 2024 forecast on three occasions in the last 9 years.

The Corps' corn forecast implies that the market share of U.S. corn exports for the Columbia River relative to the Gulf will decline in the coming decades. We believe that the opposite is true, that the Columbia River's share will increase over time. The assumption for increasing market share is confirmed by the comments and analysis of industry experts, and is stated in Faucett's 1996 projections.

The underlying long-term strength of U.S. corn exports was recently restated in the "USDA Agricultural Baseline Projections to 2007" (February 1998). This report can be viewed at the following web address:
http://www.econ.ag.gov/Briefing/baseline/index98.htm

We believe that the Corps' forecast has been unduly influenced by the short-term declines caused by the recent Asian economic crisis. We believe that corn forecasts should be adjusted upwards to more closely represent the original projections prepared by Jack Faucett Associates in 1996. The 1996 projections showed 10 million tons in 2004, 11.6 million tons in 2014, and 13.4 million tons in 2024.

While we have yet to recover to pre-crisis trade export volumes, most forecasts predict this may take only another year. When put in the context of the 50 year forecasting period used in the Feasibility Study, a period that does not even begin till the year 2004, the error of revising the forecasts because of a two to three year downturn becomes obvious.

It is reasonable to forecast that the 2000-2004 period will see healthy westbound trade growth in the transpacific trades, and that 2004 tonnage presently shown in the Feasibility Report will be met or exceeded.

In addition, please note the following correction that should be made in the Report. Table 6, title Columbia River Tonnage History, contains an error for 1997 wheat volumes. The table shows 9,634,800 shorts tons. The correct volume, according to Merchant's Exchange, should be 12,432,000 short tons This error no doubt resulted from an incorrect report that the Merchants Exchange issued. This error has since been corrected and the new figure may be confirmed by contacting the Merchant's Exchange directly. The same error should also be corrected in Table 9, page 23.

Sponsor's Disposal and Mitigation Plan

To implement the government's least cost plan contained in the DEIS, the Corps considered more than 157 upland disposal sites along the 114 mile navigation channel. Environmental and engineering screening criteria, coordination with the National Marine Fisheries Service and other resource agencies, and input from public meetings have reduced the list to 31 proposed upland disposal sites, of which eight have not previously been used.

The federal planning process allows local port sponsors the option to propose a "sponsors' plan" as an alternative to the federal "least cost plan" provided that the incremental cost increase of the sponsors' plan is paid for by the sponsors. Consequently the port sponsors developed an alternative plan with the objective of avoiding and minimizing impacts to natural resources. This sponsors' alternative substitutes transportation costs for environmental costs by moving sand longer distances to appropriate sites where dredged sand can be put to beneficial use, such as industrially zoned sites, remedial activities, or for aggregate use and reclamation. The proposed sponsors' plan contained in the DEIS relies on 29 upland disposal sites, of which only five are new. At an incremental cost of approximately $5 million over the government's least cost plan the sponsors' plan minimizes the use of farmland and puts much of the sand to beneficial uses. As a result, the sponsors' plan will have less impact on wetlands and about half the wildlife impact and the corresponding mitigation requirement of the government's least cost plan. We recommend that the Corps adopt the sponsors' plan in the final EIS because of its reduced impact on the environment.

In this vein we request that the Corps consider adding one additional existing beneficial use site to the sponsors' plan for evaluation in the FEIS. The site is managed and operated by the Port of Wahkiakum 2 at W 33.4.

Willamette River

Exports from grain elevators on the Willamette River make the Portland Harbor the single largest wheat port in the U.S. and deepening this section of the navigation channel would provide significant navigation benefits. However, sediment issues in the Portland Harbor are currently under review and remain unresolved.

The region urgently needs to move ahead with deepening the Columbia River segment to match the increasing size of vessels moving in today's waterborne commerce. We see this as a key to improving the competitiveness of U.S. products in world markets. Phasing the deepening of the Willamette River segment would allow time for careful examination of the management of Willamette River sediments without delaying the Columbia. Providing added

time for a more comprehensive approach on the Willamette segment of the channel may also present an opportunity to link Portland Harbor River cleanup efforts by the state of Oregon with the deepening of the Willamette River portion of the channel.

Before developing a recommendation on the manner in which the Willamette segment should be incorporated into the overall project we request that we be allowed to review comments received by the Corps on the Willamette River deepening plan contained in the DEIS so that we may work with you to address public concerns and project needs.

Proposed Non-Structural Alternative

The purpose of the proposed project is to improve the deep-draft transportation of goods on the Columbia and Lower Willamette Rivers navigation channels. In our view, the non-structural alternative described in the feasibility report does not provide sufficient potential for transportation benefits in order to be carried forward as an alternative to deepening the channel.

Continuous improvement of the existing river stage forecasting system (LOADMAX) is an important priority for the ports, the pilots, and the steamshipline customers that utilize the system's projected and real-time tide and river-stage information. However, in reviewing the data presented in the report, and in consultation with the NW River Forecast Center and the Columbia River Pilots, it is our conclusion that informational improvements only, would not allow any greater utilization of the existing channel than is already taking place.

LOADMAX is provided as a navigation planning tool for use on the Columbia and Willamette River systems. It has been in use since 1984 and is particularly accurate during low flow periods, when it is needed most by vessel operators, according to a study by the National Weather Service. Several significant improvements have been undertaken in the last two years by the NW River Forecast Center, which operates the model under agreement with the Port of Portland, and with these changes we believe that the current forecasts are as accurate as the science allows.

Since 1997, the hydrologists at the NW River Forecast Center have expanded the geographic boundary of the Dynamic Wave Operations Model that is used to forecast river stage to capture additional inputs into the system above Oregon City and on the Lewis and Cowlitz Rivers and updated the dynamic wave calculations. Frequency has been increased on use of Willamette flow forecasts and National Oceanic Service Tidal predictions at Astoria. New channel cross sections have been added and the model has been recalibrated with the benefit of the data from extreme high water conditions in 1996 and 1997. Several automatic adjustment procedures have been implemented to remove biases

between predicted and actual tides. These changes have enhanced the accuracy of the forecasts under all flow conditions.

The Port has worked extensively with the National Weather Service to improve the data transfer to the users, as well as to improve the forecast delivery by sending the forecast out as an E-mail. The reliability and frequency of the data transfer has increased between all parties, yet the forecast frequency is still limited to once per day under normal conditions. The reason for this pattern is to allow the River Forecast Center to do the time intensive work of coordinating with river regulators and basin managers, review boundary conditions, and provide quality control. When necessary, the new communication network allows the forecasts to be updated and delivered as required in response to significant changes, such as during flooding or unplanned regulation activity at Bonneville Dam. Ultimately the navigation forecast will be posted on the Internet to enhance access for mariners. In view of the work involved in developing each forecast, it is unlikely that the "entire forecast can be computerized so those forecasts could be obtained in a few minutes" as suggested in the Engineering Appendix.

These improvements notwithstanding, beyond the 3rd day, the current forecast is only accurate to within plus or minus one foot, due to the impacts of precipitation, adjustments to the regulation of dams, and wind conditions on the tides. It is extremely unlikely that these model inputs can be forecasted with any degree of accuracy far enough in advance to allow for the more efficient cargo scheduling as proposed in the alternative. Most cargo decisions are made weeks in advance, scheduling the arrival by barge and rail and truck far ahead of the sailing date, but with actual arrival at the export facilities within days. A long-range forecast with a bias of a foot or more will not improve vessel loading in a significant way- the costs of delays in port, demurrage, and terminal inefficiencies will maintain loading to within the range of drafts available with certainty.

Finally, the proposed non-structural alternative relies on significant improvement in the ability to assess the condition of shoaling areas in the Columbia. Inclusion of hydrographic survey data at three month intervals has the potential to add additional error to any forecast, as river conditions change on a monthly basis on many of the bars. In spite of congressional direction, it is not possible for the Corps to maintain the current 40' channel to its full 40 feet of depth at all times, and there are constant changes in the conditions which the Columbia River Pilots must take into consideration as they navigate the vessels. The only certain way to provide additional capacity for deeper draft vessels is to physically increase the depth of the channel

We see the need to make ongoing improvements in LOADMAX to enhance navigation safety and improve efficiencies. We are equally convinced that

marginal improvements in the forecasting system alone will not be sufficient to provide significant transportation benefits to the region's shippers and the nation.

Dredge OREGON

The authorizing language for the existing 40 foot channel requires that the Port of Portland provide a pipeline dredge, on a reimbursable basis, to the Corps of Engineers for maintaining and improving the navigation channel. The Port of Portland's hydraulic, cutterhead, pipeline dredge OREGON is used to fulfill this requirement. The OREGON is used primarily for maintaining the navigation channel under contract to the Corps of Engineers although the dredge is also used for land reclamation which has resulted in creation of many of the port and industrial lands on the Columbia and lower Willamette system for port and public agencies on both the Oregon and Washington sides of the river.

Paragraph 2.4.1.2 in the feasibility report states that "About 2mcy of material per year are dredged by pipeline dredges, nearly all by the Port of Portland's 30-inch dredge OREGON." Initial results from an independent study commissioned by the Port of Portland, using current data generated by the Corps of Engineers, shows that for the last four years (July 1, 1994 - June 30, 1998) the OREGON dredged approximately 16 mcy from the channel under its contract with the Corps for an annual average of 4 mcy. In addition the Port's study indicates that the OREGON unit dredging costs are at least 21% less than unit dredging costs in the Corps' cost estimating dredging program for a similar sized dredge. This reinforces the fact that the OREGON continues to be the most cost effective pipeline dredge for the Columbia River. With the shift to more upland disposal in channel maintenance and channel deepening, there will be an increased role for pipeline dredging in the future. For these reasons we recommend that the requirement for the Port of Portland to provide a pipeline dredge to the Corps be carried forward into the authorizing language for the new 43 foot channel.

Ecosystem Restoration

In addition to our commitment to the region's economic future through channel deepening, the Columbia River ports are also committed to completing the ecosystem restoration component of the project. From the initial planning stages we recognized our responsibilities as project sponsors to demonstrate a commitment to not only mitigate for environmental impacts but to also, where possible, to improve or restore the natural environment. We are pleased with this opportunity to show our commitment and to move forward in a partnering effort with the Corps of Engineers on this important environmental project.

In conclusion, we urge the Corps to move forward expeditiously and incorporate the sponsors' plan in the final EIS so that this critical project can be authorized and constructed as quickly as possible.

Port of Kalama

Port of St. Helens

Port of Longview

Port of Vancouver

Port of Portland

Port of Woodland